

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION**

**MDL NO. 2724
Case No. 16-md-2724-CMR**

THIS DOCUMENT RELATES TO:

HON. CYNTHIA M. RUFE

ALL ACTIONS

**DEFENDANT HERITAGE PHARMACEUTICALS INC.'S THIRD
MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Defendant Heritage Pharmaceuticals Inc. (“Heritage”), pursuant to Fed. R. Civ. P. 5.2(d), Local Rules 5.1.2(7) and 5.1.5, by and through its undersigned counsel, hereby moves this Court for an Order granting leave to file under seal Heritage’s Reply in Support of its Objection to Special Master Marion’s Third Report and Recommendation Relating to Bellwether Selection (including the Declaration of Scott D. Hammond attached thereto as Exhibit 1), as well as the Memorandum in Support of this Motion filed contemporaneously herewith. Heritage has sought consent of the Plaintiffs and other Defendants for the relief sought in this Motion. As of the time of filing, counsel for the EPPs and IRPs have indicated they consent to this Motion, but Heritage did not receive responses from the other parties. The points and authorities supporting this Motion are set forth in Heritage’s Memorandum in Support of this Motion filed under seal contemporaneously herewith. A proposed Order is attached.

April 23, 2020

Respectfully submitted,

/s/Edward B. Schwartz

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*Counsel for Defendant Heritage
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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2020, a copy of the foregoing Defendant Heritage Pharmaceuticals Inc.'s Third Motion for Leave to File Document Under Seal was filed via the Court's ECF system, which will provide service to all registered counsel.

/s/ Nicholas V. Albu
Nicholas V. Albu, Esq.